

INTERNATIONAL MILITARY TRIBUNAL  
FOR THE FAR EAST

- 1 -

THE UNITED STATES OF AMERICA, et al

- VS -

ARAKI, Sadao, et al

- Defendants -

REQUEST FOR PRODUCTION OF WITNESSES

NOW COMES UMEZU Yoshijiro and requests the Tribunal, in accordance with Article 9(e) of the Charter, to order the production of the following witnesses necessary to his defense:

1. Lieutenant General HATA Hikozauro (also known as HADA Hikozauro)
  - a. The nationality of the witness is Japanese;
  - b. The address of the witness is unknown; his last official position was Chief of Staff of the Kwantung Army, and he was last reported as having surrendered to the Russian forces in Manchuria on or about 20 August 1945;
  - c. The facts to be proved by this witness are the policies, utterances and actions of the defendant UMEZU during the period that the witness was Chief of Staff of the Kwantung Army, of which the defendant UMEZU was Commander-in-Chief;
  - d. The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment, and was not responsible for the planning, initiating or waging of wars of aggression;

- e. The date upon which the attendance of the witness will be required to testify cannot be stated accurately; but his attendance for consultation with counsel is required forthwith;

2. Major General YAMAMOTO Moichiro (known also as YAMAMOTO Shigeichiro)

- a. The nationality of the witness is Japanese.
- b. The address of the witness is unknown; the last official position was Chief of Staff of the 16th Army in Java;
- c. The facts to be proved by this witness are the policies, utterances and actions of the defendant UMEZU during the period that the witness was Secretary to the said defendant who was then Vice-Minister of War;
- d. The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment and was not responsible for the planning, initiating or waging of wars of aggression;
- e. The date upon which the attendance of witness will be required cannot be stated accurately; but his attendance for consultation with counsel is required forthwith;

3. Major General MATSUMURA Tomokatsu.

- a. The nationality of the witness is Japanese;
- b. The last official position of witness was Vice-Chief of Staff of the Kwantung Army and he is now believed to be a prisoner of war of the Russian forces in Manchuria;



- c. The facts to be proved by this witness are the policies, utterances and actions of the defendant UMEZU during the period that the witness was Chief of Operations Section of the staff of the Kwantung Army;
  - d. The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment and was not responsible for the planning, initiating or waging of wars of aggression;
  - e. The date upon which the attendance of witness will be required cannot be stated accurately; but his attendance for consultation with counsel is required forthwith;
4. Lieutenant General KASAHARA Yukio;
- a. The nationality of the witness is Japanese;
  - b. The last official position of witness was commanding general of the 11th Army, and he is believed to be a prisoner of war of the Chinese forces;
  - c. The facts to be proved by this witness are the policies, utterances and actions of the defendant UMEZU during the period that the witness was Chief of Staff to the Kwantung Army, of which the defendant UMEZU was Commander-in-Chief;
  - d. The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment and was not responsible for the planning, initiating or waging of wars of aggression;

- e. The date upon which the attendance of witness will be required cannot be stated accurately; but his attendance for consultation with counsel is required forthwith;

5. Lieutenant General IIDA Shojiro;

- a. The nationality of the witness is Japanese;
- b. The last official position of witness was commanding general of the 3rd Army, and he is believed to be a prisoner of war of the Russian forces in Manchuria;
- c. The facts to be proved by this witness are the policies, utterances and actions of the defendant UMEZU during the period that the witness was Chief of Staff to the Kwantung Army, of which the defendant UMEZU was Commander-in-Chief;
- d. The relevance of the witness' testimony is in its tendency to establish that the defendant UMEZU took no part in any of the conspiracies alleged in the indictment and was not responsible for the planning, initiating or waging of wars of aggression;
- e. The date upon which the attendance of witness will be required cannot be stated accurately; but his attendance for consultation with counsel is required forthwith.

UMEZU Yoshijiro

by

MIYAKE Shotaro

Ben Bruce Blakeney  
Major, AC

His Counsel